

PSJ4 SOL Opp Exh 43

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4
5 IN RE: NATIONAL MDL No. 2804
6 PRESCRIPTION OPIATE
7 LITIGATION Case No.
8 1:17-MD-2804

7
8 THIS DOCUMENT RELATES TO Hon. Dan A. Polster
9 ALL CASES

10
11 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
12 CONFIDENTIALITY REVIEW
13 VIDEOTAPED DEPOSITION OF DEAN A. VANELLI

14
15 Wednesday, January 16th, 2019
16 8:03 a.m.

17
18 Held At:
19 Omni Hotel
20 One West Exchange Street
21 Providence, Rhode Island

22
23 REPORTED BY:
24 Maureen O'Connor Pollard, RMR, CLR, CSR

1 A. I'm sorry.

2 Q. I'm sorry. Go ahead.

3 A. And look at the timing. It most
4 likely would be Amy Propatier's direct manager
5 at this time.

6 Q. Amy Propatier was what?

7 A. Amy Propatier was a coordinator.

8 Q. Were you aware that she was the
9 director of DEA compliance?

10 A. Not in any time that Amy reported to
11 me was she the director of DEA compliance. I do
12 not believe Amy has ever been a director in her
13 time at CVS.

14 Q. Or manager of DEA compliance, or the
15 head of DEA compliance, or any term like that?

16 A. Amy had a role where -- again, going
17 back to our previous discussion of the role of
18 my department as being the liaison between
19 customer support center and the distribution
20 centers, Amy would facilitate or coordinate
21 activities between those two groups. At no time
22 did Amy have ownership of any DEA compliance, to
23 my knowledge, with the exception of she was
24 responsible for filing ARCOS reporting.